

CalFed Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

September 20, 1999

Dear Cal Fed Bay Delta Program:

RE: Comments on Draft EIS

Thank you for the opportunity to comment on the Cal Fed Draft Environmental Impact Statement. Water quality is an issue faced by all California citizens. The EIS correctly identifies urbanization as a major factor influencing California water issues. However, the EIS does not even mention urban and community forestry as a cost effective watershed management solution to this difficult challenge.

Urban and community forestry is becoming recognized as a critical component of urban infrastructure. Urban and community forest management decreases water runoff in urban areas, reduces erosion, and improves water quality. This is an area with defined impacts and a rapidly developing body of knowledge.

Pioneering work by the Tree People organization in the LA Basin has demonstrated that both energy and water use can be decreased through the establishment of urban forest infrastructure. Permeable paving, increased canopy cover, use of berms on planting strips etc. all serve to increase water permeation and reduce run-off. This information is clearly outlined in "Second Nature - Adapting LA's Landscape for Sustainable Living" produced by Tree People. Similar strategies have been implemented in Chesapeake Bay and other areas.

Additionally, research performed by the USFS PSW Urban Forestry Lab in Davis, California has shown substantial energy cost savings as a result of increased urban canopy cover. Presumably, the resulting conservation of energy has a direct impact on the amount of water needed for hydroelectric facilities and residential watering. The increased interception rates from the forest canopy reduce storm run off rates, decreasing the need for new urban wastewater treatment centers.

In rural areas, community forestry is also a critical component of water quality management. California citizens recognized this when they approved proposition 204 and set aside money to improve water quality. Much of the money has been allocated to watershed management in rural areas. As in urban areas, there is a clear link between water quality, erosion, and flooding, with responsible forest management. In rural areas, this means reducing the impacts of wildfire through timber management, controlled burning, establishment of fuel breaks, and effective defensible space.

In summary, urban and community forestry is a critical piece of infrastructure necessary for effective water management in California. The EIS fails to mention urban or community forestry anywhere in its 2500 pages. I believe it necessary that CALFED include a complete evaluation of urban and community forestry watershed management in the EIS as a cost-effective solution that causes the least adverse environmental impact. It is simply unreasonable to under take a project of this magnitude without including all of the available and essential information regarding water quality. This should be rectified before a final decision is reached.

Thank you for the opportunity for comment.

Sincerely,



Hugh Merriam
Member- California Urban Forest Advisory Council

CC:

Andrea Tuttle, CDF